

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

KAREN PARSONS,

Plaintiff,

V.

**BRIGHTHOUSE NETWORKS,
LLC**

Defendant.

CIVIL ACTION NO.:

2:09-cv-267-AKK

**JOINT MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT AGREEMENT AND APPROVAL
OF FORM AND CONTENT OF NOTICE TO CLASS MEMBERS**

The parties to the above-captioned putative class action (the “Action”), Plaintiff Karen Parsons (“Plaintiff”) and Defendant Bright House Networks, LLC (“BHN” or “Defendant”) (together, the “Parties”), respectfully move this Court for an order (1) preliminarily approving the Settlement as set forth in the settlement agreement entered into by the Parties on August 12, 2014, and attached hereto as Exhibit A (the “Settlement Agreement”), (2) certifying the Settlement Class (as defined in the Memorandum in Support of Joint Motion for Preliminary Approval of Class Settlement and Approval of Form and Content of Notice to Class Members, submitted herewith), (3) approving the proposed Notice Program (as set

forth in the Memorandum in Support of Joint Motion for Preliminary Approval of Class Settlement and Approval of Form and Content of Notice to Class Members, submitted herewith), and directing that Notice be disseminated to the Settlement Class as proposed therein, (4) setting the Objection Deadline to be 60 days after the Notice Date, (5) scheduling the Final Fairness Hearing for a date 30 days after the Objection Date, and (6) appointing Whatley Kallas, LLP, Wiggins, Childs, Quinn and Pantazis, LLC, and Quinn, Connor, Weaver, Davies & Rouco as Settlement Class Counsel.

This Joint Motion is based on the reasons set forth in: (1) the Memorandum in Support of Joint Motion for Preliminary Approval submitted herewith; (2) the Declaration of Joe R. Whatley, Jr. and its annexed exhibits submitted as Exhibit B hereto; and (4) the files and records in this case.

Respectfully submitted this 12th day of August, 2014.

/s/Joe R. Whatley, Jr.

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CERTIFICATION

I certify that on August 12, 2014, a copy of this document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Joe R. Whatley, Jr.
Joe R. Whatley, Jr.